

Daniel M. Cunningham
Scott L. Machanic
Dana A. Cetlin [±]
David C. Johnson (1949-2000)
Peter P. Harney
Robert F. Tenney
Robert J. Riccio
Mary E. Arata
Holly B. Anderson
Gregory M. Judice
Of Counsel
Edward C. Uehlein (1911-2003)

Lakewood Office Park
220 North Main Street
Natick, Massachusetts 01760-1100
(508) 651-7524 (781) 237-7030
FAX: (508) 653-0119
email: cmlaw@cmlaw.net
www.cunninghammachanic.com

[±] Also Admitted in New Hampshire

Of Counsel (cont'd):
William M. Zall
Richard B. Schaefer
Judith L. Melideo-Preble
Richard A. Zucker
Paralegals:
Jenny Hall Maltais
Pamela J. Szretter
Joanne Kramer Zall
Shelley R. Kamen
Sara M. Reyes

May 18, 2006

Anthony Campbell
267 Mill Street, Apt. #302
Worcester, MA 01602

Anthony Campbell
P.O. Box 3469
Worcester, MA 01613

Re: Anthony Campbell v. Isolation Technologies, Inc. and Larry D'Amato
U.S.D.C. Case No. 04-40236

Dear Mr. Campbell:

I today received your supplemented response to our discovery request, however, you failed to comply with Judge Saylor's order. Please refer to our motion and the Order of Magistrate Judge Hillman that you comply with all discovery requested. Again, Judge Saylor ordered that you provide all requested discovery responses, however, you have failed to comply with his order to provide the following:

- Federal tax returns, (including attachments) for 1999 through 2005. Your w-2 forms are not a substitute for these documents.
- Documents relating to your employment and employment searches both before and after Isolation Technologies, as more specifically described in numbers 2, 3, 4 and 5 of our Second Request For Production of Documents. You testified under oath at deposition that you possessed documents which would be responsive to these requests.
- You have now stated that you do not possess the 2nd page to your Attorney General complaint form, however, you testified under oath at deposition that you were "sure" that you had the form. If you do not provide the requested page, then I would ask you to provide us with a letter, addressed to the Attorney General, authorizing release of the document to me.

Finally, you continue to refuse to comply with our demand that you supplement your response to our Interrogatory No. 8, regarding detailed information as to all jobs which you

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Anthony Campbell

May 18, 2006

Page 2 of 2

held during the requested period. A copy of our follow-request was made by letter, dated October 24, 2005, and was again supplied to you as an exhibit to our Motion to Compel.

Mr. Campbell, you have an obligation to review and fully comply with the requests and it is clear that you have failed to comply with Judge Saylor's order. Your responses should address each of the numbered requests, as well as the supplemented interrogatory request. If all requested documents and supplemented interrogatory answer are not received at our office by Monday, May 22, 2006, we will request that sanctions be entered against you, including dismissal of your suit. Additionally, if you need to provide the letter authorizing release of the document from the Attorney General's office, I would ask that it also be provided by May 22nd.

Very truly yours,
CUNNINGHAM, MACHANIC,
CETLIN, JOHNSON & HARNEY, LLP



William M. Zall

cc. Michael Rigoli
WMZ/251459